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FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN JOSE

5 Counsel for Defendant Sanjeev Bais

6
7 **UNITED STATES DISTRICT COURT**
8 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN JOSE DIVISION**

10 UNITED STATES,

11 Plaintiff,

12 v.

13
14 SANJEEV BAIS,

15 Defendant.

Case No. CR 13-00252 DLJ HRL

STIPULATION AND []
ORDER TO CONTINUE STATUS
CONFERENCE AND TO EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT

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19 IT IS HEREBY STIPULATED AND AGREED between the Government, through
20 Special Assistant United States Attorney Charles Parker, and Defendant Sanjeev Bais, through his
21 attorney Daniel Olmos, that the status conference presently set for June 20, 2013, be continued to
22 August 2; , 2013, at 9:00 a.m. The reason for the request for continuance is that defense counsel
23 needs additional time to review discovery, including a hard drive that it has yet to receive from
24 the government.
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26 The parties appeared for their first status conference in this Court on May 9, 2013. On
27 that date, defense counsel indicated to the Court that he needed time to review discovery
28

1 disclosed by the government. The government has turned over substantial paper discovery in this
2 case but, until recently, the IRS Computer Investigation Specialist assigned to the matter has been
3 unavailable to copy a hard drive seized from Mr. Bais. Defense counsel has provided a blank
4 hard drive to the IRS, and anticipates receiving an image of Mr. Bais's hard drive in the coming
5 weeks. The parties agree that the status conference now scheduled for June 20 should be
6 continued in order to allow defense counsel to receive and review the contents of the hard drive.
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8 The parties agree that the time between June 20, 2013, and August 2; , 2013, should be
9 excluded from calculations under the Speedy Trial Act, which excludes delay when the interests
10 of justice in allowing for the effective preparation of defense counsel outweigh the best interest of
11 the public and the defendant in a speedy trial, taking into account the exercise of due diligence.
12 18 U.S.C. § 3161(h)(7).
13

14 IT IS SO STIPULATED:

15 Dated: June 10, 2013

NOLAN, ARMSTRONG & BARTON LLP

18 /s/
19 DANIEL B. OLMOS
Attorney for Defendant Sanjeev Bais

20 Dated: June 10, 2013

22 /s/
23 CHARLES PARKER
Special Assistant United States Attorney

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6 **UNITED STATES DISTRICT COURT**
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9 UNITED STATES,

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13 SANJEEV BAIS,

14 Defendant.
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Case No. CR 13-00252 DLJ HRL

**[] ORDER TO CONTINUE
STATUS CONFERENCE AND EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT**

16 GOOD CAUSE HAVING BEEN SHOWN, it is hereby ordered that the status conference
17 in this matter now scheduled for June 20, 2013, at 9:00 a.m. is hereby rescheduled for August 2; ,
18 2013, at 9:00 a.m. Based upon the representation of counsel and for good cause shown, the Court
19 also finds that the time between June 20 and August 2; , 2013, shall be excluded from calculations
20 under the Speedy Trial Act. The interests of justice in allowing for the effective preparation of
21 defense counsel outweigh the best interest of the public and the defendant in a speedy trial, taking
22 into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7).
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24 Dated: ~~1~~ ~~5~~ ~~FF~~ ~~GG~~

25 
26 The Hon. D. Lowell Jensen
27 United States District Judge
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